Exhibit A

EXHIBIT A – JOINT CLAIM CONSTRUCTION CHART

Claim Language	Claim Term(s)	Headwater's Proposal	Samsung's Proposal	Court's Construction
2918 Patent, Claim 1. A wireless end-user device, comprising: a wireless modem configurable to connect to a wireless network; a network stack configurable to receive and transmit data via the wireless modem and the wireless network; a first network stack Application Programming Interface (API), containing at least one first call accessible to each of a plurality of device applications, the first network stack API callable by each of the plurality of device applications to open and use data packet flows via the network stack, the wireless modem, and the at least one wireless network; a second API containing at least one second call accessible to each of the plurality of device applications, the second API callable by each of the plurality of device applications to make a data transfer request for a media object associated with a network resource identifier supplied by the calling device application; a media service manager prompted by the second call, to manage network data transfers for the media object by interfacing with the network stack to retrieve the media object associated with the network resource identifier via the wireless modem and the wireless network; and one or more service classification and measurement agents to associate wireless network data usage for the media object network data transfers with the device application that requests the data transfer for the media	"the calling device application" '918 patent, claim 1; '918 patent, claim 14.	Not indefinite; plain and ordinary meaning.	Indefinite.	

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object, to associate wireless network data usage for respective data packet flows opened and used via the first network stack API with the device application opening such respective data packet flow, and to reconcile wireless network data usage for each of the plurality of device applications to track an aggregate wireless network data usage attributable to each of the plurality of device applications via both the first network stack API and the second API. '918 Patent, Claim 14. A method of operating a wireless enduser device when connected via a wireless modem to a wireless network, the method comprising: operating a first network stack Application Programming Interface (API), containing at least one first call accessible to each of a plurality of device applications, the first network stack API callable by each of the plurality of device applications to open and use data flows via a network stack coupled to the wireless modem; operating a second API containing at least one second call accessible to each of the plurality of device applications, the second API callable by each of the plurality of device applications, the second API callable by each of the plurality of device applications to make a data transfer request for a media object associated with a network resource identifier supplied by the calling device application;		Proposal	Proposal	Construction
operating a media service manager prompted by the second call, the media service manager managing network data transfers for the media object by interfacing with the network stack to retrieve the media				

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object associated with the network resource identifier via the wireless modem and the wireless network; and associating wireless network data usage for the media object network data transfers with the device application that requests the data transfer for the media object, associating wireless network data usage for respective data packet flows opened and used via the first network stack API with the device application opening such respective data packet flow, and reconciling wireless network data usage for each of the plurality of device applications to track an aggregate wireless network data usage attributable to each of the plurality of device applications via both the first network stack API and the second API.				